

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

Jointly Administered

Re: Docket No. 58

**RESERVATION OF RIGHTS OF SECURED BONDHOLDER REPRESENTATIVES
TO MOTION FOR SALE OF ASSETS**

Computershare Trust Company, N.A., as Master Trustee, and Preston Hollow Community Capital, Inc., as Bondholder Representative (together, the “Secured Bondholder Representatives”), submit this reservation of rights with respect to the *Debtors’ Motion for Entry of Order Approving the Sale of the Debtors’ Assets Free and Clear of Liens, Claims, Interests and Encumbrances, Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases, and Granting Related Relief* [Docket No. 58] (the “Sale Motion”), and respectfully state as follows:¹

1. The Secured Bondholder Representatives have a vital interest in the Sale Motion, given that they hold first priority liens and security interests on substantially all of Mercy’s real property and personal property assets that are the subject matter of the proposed sale to the State University of Iowa. As such, the Secured Bondholder Representatives are working with the Debtors and other parties in interest to address, and attempt to resolve, certain concerns that they have surrounding the sale. However, in the event they are not able to resolve their concerns in

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Sale Motion.

advance of the sale hearing, the Secured Bondholder Representatives hereby reserve all rights, including their right to be heard at the sale hearing.

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Date: November 2, 2023

WHITFIELD & EDDY, P.L.C.

/s/ Peter J. Chalik

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing dated November 2, 2023.

/s/ Peter J. Chalik